

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

State Farm Fire and Casualty Company as) C/A No. 2:23-cv-04434-DCN
Subrogee of Jacqueline Harris,)
Plaintiff,)
)
v.)
)
Omega Flex, Inc.,)
)
Defendant.)

AGREED STIPULATION OF DISMISSAL

Plaintiff, State Farm Fire and Casualty Company as Subrogee of Jacqueline Harris (“Plaintiff”), and Defendant, Omega Flex, Inc. (“Defendant”), file this Agreed Stipulation of Dismissal pursuant to Federal Rules of Civil Procedure 41(a)(1)(A)(ii), and would show the Court the following:

1. Plaintiff is State Farm Fire & Casualty as Subrogee of Jacqueline Harris and Defendant is Omega Flex, Inc.
2. On August 2, 2023, Plaintiff sued Defendant in the Court of Common Pleas First Judicial District, County of Dorchester, State of South Carolina. This matter was removed to this Court on September 1, 2023.
3. Plaintiff desires to dismiss this case with prejudice as all matters in controversy with Defendant have been resolved to Plaintiff’s satisfaction.
4. Defendant, who has served an Answer, agrees to the dismissal with prejudice of any and all claims, cross-claims, counter-claims or claims for indemnity or contribution that have been or could have been asserted against any other party herein, with all costs of court and attorneys’ fees to be borne by the party incurring same.

5. This case is not a class action.
6. This case is not governed by any federal statute that requires a court order for dismissal of the case.

Respectfully submitted,

By: /s/ Todd E. Rigler
Todd E. Rigler
Federal S.C. Bar No. 11917
trigler@cstriallaw.com
Clawson & Staubes, P.C.
1039 44th Ave., N., Suite 104
Myrtle Beach, SC 29577
(843) 329-0252

By: /s/Lauren K. Brown
Brian Kern
Federal S.C. Bar No. 10885
brian.kern@hoodlaw.com
Hood Law Firm
172 Meeting Street
Charleston, South Carolina 29401
Phone: (843) 577-1204
Fax: (843) 722-1630

Lauren K. Brown
Admitted *Pro Hac Vice*
lbrown@campbell-trial-lawyers.com
Campbell Conroy & O'Neil, P.C.
1205 Westlakes Drive, Suite 330
Berwyn, PA 19312
Phone: (610) 964-1900
Fax: (610) 964-1981
ATTORNEYS FOR DEFENDANT OMEGA FLEX, INC.